



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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March 18, 2016

*BY ECF*

Honorable Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Martin El v. John Doe, et al.*, 15-CV-6581 (BMC)(RLM)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel for the City of New York, and the attorney representing the City of New York ("City") and Officer Cordova in the above-referenced matter wherein plaintiff, who is proceeding *pro se*, asserts claims of, *inter alia*, false arrest and excessive force. I write to respectfully request that the Court order plaintiff to comply with the Court's previous orders that he provide a signed Consent and Authorization for Release of Records Sealed Pursuant to New York Criminal Procedure Law §§ 160.50 and 160.55 by a date certain.

As Your Honor will recall, on January 28, 2016, the Court ordered plaintiff to deliver a signed §160.50 Release by February 5, 2016. On the same day, this office forwarded plaintiff a §160.50 for his signature. Receiving nothing, during a phone conference on February 22, 2016, this office requested and the Court again directed plaintiff to provide a signed §160.50 Release to this office by February 26, 2016. On February 22, 2016, this office again sent plaintiff a §160.50 Release for his signature. To date, this office has yet to receive an executed release from plaintiff. On March 16, 2016, the undersigned called plaintiff to determine whether he intends to furnish an executed §160.50 Release, however, the phone number listed for plaintiff on the docket sheet appears to be disconnected.

Not only is plaintiff preventing defendants from adequately assessing the claims asserted against them, he has also failed to comply with two court orders. Accordingly, defendants respectfully request that the Court order plaintiff to comply with the Court's previous orders that he provide a signed §160.50 Release by a date certain.

I thank Your Honor for your consideration herein.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Colin M. Ceriello  
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cc: *BY FIRST CLASS MAIL*  
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